

To: CN=Karen Schwinn/OU=R9/O=USEPA/C=US@EPA[]
Cc: []
From: CN=Bruce Herbold/OU=R9/O=USEPA/C=US
Sent: Thur 8/18/2011 11:51:23 PM
Subject: Re: my quick response to the BDCP Effects Framework document

yes, impacts of BDCP on DS habitat is required, as I understand it. Ideally, there would be restored actions but the EA is supposed to look at impacts on the species and on their habitats. At least that's what the guidance document you sent earlier said "For section 7.. the potential effects on listed and proposed species and designated and proposed critical habitat.

The Springtime X2 rule is explicitly part of DS critical habitat ,but the rest of the year is covered too:

- "1) to maintain suitable habitat
- 2) conditions for recovery of the delta
- 3) smelt, the naturally-occurring variability
- 4) found in healthy estuarine ecosystems
- 5) must be preserved for the following
- 6) reasons—(1) temporal and spatial
- 7) variability of the 2 ppt isohaline will be
- 8) the most effective suitable habitat

From: Karen Schwinn/R9/USEPA/US
To: Bruce Herbold/R9/USEPA/US@EPA
Date: 08/18/2011 04:30 PM
Subject: Re: my quick response to the BDCP Effects Framework document

Still confused here.

Is your point that the EA needs to analyze all habitat types in the BdcP restoration program and all ICF seems to be looking at is tidal?

I think the A9 quote is an accurate description of the current bdcP proposal.

~~~~~  
KAREN SCHWINN  
Associate Director  
Water Division  
U.S. EPA Region 9  
75 Hawthorne Street (Wtr-1)  
San Francisco, CA 94105  
415/972-3472  
415/297-5509 (mobile)  
415/947-3537 (fax)  
~~~~~

----- Original Message -----

From: Bruce Herbold
Sent: 08/18/2011 04:20 PM PDT

To: Karen Schwinn

Subject: Re: my quick response to the BDCP Effects Framework document

I don't think so, unless BDCP has indeed decided that marsh is the only habitat, but the framework is not identifying how it will analyze effects of any other habitats.

B

From: Karen Schwinn/R9/USEPA/US

To: Bruce Herbold/R9/USEPA/US@EPA

Date: 08/18/2011 04:13 PM

Subject: Re: my quick response to the BDCP Effects Framework document

Thanks. I have one question now and may have more before I send.

In your 2nd paragraph, where you quote the paper's statement on p A-9, it sounds a little like you are critiquing the BDCP itself and its emphasis on tidal marsh, rather than ICF's approach to analyzing that part of the BDCP. Do I read that wrong? Understand I'm reading on a little screen on a bumpy bus.

~~~~~  
KAREN SCHWINN  
Associate Director  
Water Division  
U.S. EPA Region 9  
75 Hawthorne Street (Wtr-1)  
San Francisco, CA 94105  
415/972-3472  
415/297-5509 (mobile)  
415/947-3537 (fax)  
~~~~~

----- Original Message -----

From: Bruce Herbold

Sent: 08/18/2011 03:45 PM PDT

To: Karen Schwinn; Tom Hagler; Carolyn Yale; Erin Foresman; Tim Vendlinski; Sam Ziegler

Subject: my quick response to the BDCP Effects Framework document

I'm not encouraged.

Bruce

[attachment "bdcappA.docx" deleted by Karen Schwinn/R9/USEPA/US]